

CARELLA, BYRNE, CECCHI, OLSTEIN, BRODY & AGNELLO, P.C.
COUNSELLORS AT LAW

CHARLES C. CARELLA
BRENDAN T. BYRNE
JAN ALAN BRODY
JOHN M. AGNELLO
CHARLES M. CARELLA
JAMES E. CECCHI

JAMES D. CECCHI (1933-1995)
JOHN G. GILFILLAN III (1936-2008)
ELLIOT M. OLSTEIN (1939-2014)

JAMES T. BYERS
DONALD F. MICELI
A. RICHARD ROSS
CARL R. WOODWARD, III
MELISSA E. FLAX
DAVID G. GILFILLAN
G. GLENNON TROUBLEFIELD
BRIAN H. FENLON
LINDSEY H. TAYLOR
CAROLINE F. BARTLETT

**5 BECKER FARM ROAD
ROSELAND, N.J. 07068-1739
PHONE (973) 994-1700
FAX (973) 994-1744
www.carellabyrne.com**

PETER G. STEWART
FRANCIS C. HAND
AVRAM S. EULE
CHRISTOPHER H. WESTRICK*
JAMES A. O'BRIEN III**

OF COUNSEL

*CERTIFIED BY THE SUPREME COURT OF
NEW JERSEY AS A CIVIL TRIAL ATTORNEY
**MEMBER NY AND MA BARS ONLY

RAYMOND J. LILLIE
WILLIAM SQUIRE
STEPHEN R. DANEK
DONALD A. ECKLUND
MEGAN A. NATALE
ZACHARY S. BOWER+
MICHAEL CROSS
CHRISTOPHER J. BUGGY
JOHN V. KELLY III
MICHAEL A. INNES

+MEMBER FL BAR ONLY

September 13, 2020

VIA ECF

Clerk
United States District Court
Mitchell H. Cohen Federal Building and U.S. Courthouse
4th and Cooper Streets
Camden, New Jersey 08101

Re: *The Colby Restaurant Group v. Utica National Insurance*
Civil Action No. 20-5927 (RMB)

Dear Sir:

We are co-counsel for Plaintiffs in the above matter. Defendant filed a motion to dismiss on September 11, 2020 (ECF No. 17), returnable on October 5, 2020. Accordingly, Plaintiffs' opposition to the Motion to Dismiss is currently due on or before September 21, 2020.

Pursuant to L.Civ.R.7.1(d)(5), Plaintiffs respectfully request an automatic extension of the return date of the motions to dismiss to the next regular motion day, October 19, 2020, which would make Plaintiffs' opposition papers due on October 5, 2020. 14 days before the new return date.

Thank you for your attention to this matter. If you have any questions, we are available at your convenience.

Respectfully submitted,

CARELLA, BYRNE, CECCHI,
OLSTEIN, BRODY & AGNELLO, P.C.

/s/ Lindsey H. Taylor

LINDSEY H. TAYLOR

cc: All Counsel (via ECF)